

1 WRIGHT, FINLAY & ZAK, LLP

2 Darren T. Brenner, Esq.

3 Nevada Bar No. 8386

4 Lindsay D. Dragon, Esq.

5 Nevada Bar No. 13474

6 7785 W. Sahara Ave., Suite 200

7 Las Vegas, NV 89117

8 (702) 637-2345; Fax: (702) 946-1345

9 dbrenner@wrightlegal.net

10 ldragon@wrightlegal.net

11 *Attorneys for Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as Trustee for
12 the Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-OA2 Mortgage Pass-
13 Through Certificates, Series 2006-OA2*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 THE BANK OF NEW YORK MELLON,
17 F/K/A THE BANK OF NEW YORK, AS
18 TRUSTEE FOR THE CERTIFICATE-
19 HOLDERS OF THE CWALT, INC.,
20 ALTERNATIVE LOAN TRUST 2006-OA2
21 MORTGAGE PASS-THROUGH
22 CERTIFICATES, SERIES 2006-OA2,

23 Plaintiff,

24 vs.

25 NORTH AMERICAN TITLE INSURANCE
26 COMPANY, DOE INDIVIDUALS I through
XX; and ROE CORPORATIONS XI through
XX, inclusive,

Defendants.

Case No.: 2:21-cv-00395-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE A
~~PROPOSED~~ DISCOVERY PLAN**

(Third Request)

27 Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as Trustee for the
28 Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-OA2 Mortgage Pass-
Through Certificates, Series 2006-OA2 (“BONY”) and Defendant, North American Title
Insurance Company (“NATIC”), by and through their undersigned counsel, stipulate and agree
as follows:

1. On March 8, 2021, BONY filed its Complaint in Eighth Judicial District Court, Case No.
A-21-830741-C [ECF No. 1-1];

- 1 2. On March 10, 2021, NATIC filed a Petition for Removal to this Court [ECF No. 1];
- 2 3. On May 6, 2022, the Court ordered that the stay of the instant action shall be extended
- 3 while the parties discuss potential settlement [ECF No. 14]. The Parties were ordered to
- 4 file a Joint Status Report ninety (90) days after entry of the order. *Id.*;
- 5 4. On November 2, 2022, the Parties filed a Joint Status Report advising the Court that the
- 6 Parties attended a private mediation on September 29, 2022, which did not result in
- 7 settlement. The Parties requested thirty (30) days to submit their proposed discovery plan
- 8 [ECF No. 16];
- 9 5. On December 1, 2022, the Parties requested an extension until January 3, 2023 to submit
- 10 their proposed discovery plan as BONY's counsel was preparing for an oral argument
- 11 with the Ninth Circuit, which was granted by the Court [ECF No. 22];
- 12 6. On January 3, 2023, the Parties requested an extension until February 2, 2023 to submit
- 13 their proposed discovery plan, as BONY's counsel needed additional time to confer with
- 14 its client in light of the holidays.
- 15 7. While the proposed joint discovery plan has been drafted, the Parties need additional time
- 16 to review and finalize the terms and are requesting an additional seven (7) days to do so,
- 17 through and including February 9, 2023.
- 18 8. Counsel for NATIC does not oppose the requested extension;

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1 9. This is the third request for an extension which is made in good faith and not for purposes
2 of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 2nd day of February, 2023.

5 WRIGHT, FINLAY & ZAK, LLP

6 /s/ Lindsay D. Dragon, Esq.

7 Lindsay D. Dragon, Esq.
8 Nevada Bar No. 13474
9 7785 W. Sahara Ave., Suite 200
10 Las Vegas, Nevada 89117
11 *Attorneys for Plaintiff, The Bank of New
12 York Mellon, f/k/a The Bank of New York, as
13 Trustee for the Certificateholders of the
14 CWALT, Inc., Alternative Loan Trust 2006-
15 OA2 Mortgage Pass-Through Certificates,
16 Series 2006-OA2*

DATED this 2nd day of February, 2023.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair, Esq.

Kevin S. Sinclair, Esq.
Nevada Bar No. 12277
16501 Ventura Blvd, Suite 400
Encino, California 91436
*Attorneys for Defendant, North American
Title Insurance Company*

17 IT IS SO ORDERED.



18 _____
19 Cam Ferenbach
20 United States Magistrate Judge

21 2-6-2023
22 DATED _____